

REMARKS

Claims 1 and 3-6 were examined and reported in the Office Action. Claims 1 and 3-6 are rejected. Claim 1 is objected to. Claims 1 and 3-5 are amended. Claims 1 and 3-6 remain. It is asserted that the specification is objected to for failing to provide proper antecedent basis regarding "light fixture coupling brackets as being coupled to a light bar coupling device. Applicant has amended paragraph [0037] to clarify the nature of the light fixture coupling brackets (see Figs. 1, 5, and 7, reference 150) and light bar coupling device (see Figs. 1, 5, and 7, reference 190). Viewing Figs. 1, 5 and 7, it is clear that light bar coupling devices 190 couple light bar bracket 160 to light fixture coupling brackets 150 by insertion into second frame 110. Therefore, no new matter is added. Moreover, from viewing the Figures and reading the associated description, an ordinary person skilled in the art would be able to clearly understand the relationship between the light bar coupling devices 190, the light bar bracket 160, the light fixture coupling brackets 150 and second frame 110.

Applicant requests reconsideration of the application in view of the following remarks.

I. 35 U.S.C. §112, Second Paragraph

It is asserted in the Office Action that claims 1, 3 and 4 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicant has amended claim 1 and the specification to overcome the 35 U.S.C. §112, second paragraph rejection and to clarify the relationship between the elements for easy understanding. Applicant has also amended claims 3 and 4 to depend from amended claim 1.

Accordingly, withdrawal of the 35 U.S.C. §112, second paragraph rejections for claims 1, 3 and 4 are respectfully requested.

III. 35 U.S.C. § 103(a)

It is asserted in the Office Action that claims 1 and 3-6 are rejected in the Office Action under 35 U.S.C. § 103(a), as being unpatentable over U. S. Patent No. 6,106,125 issued to Finn et al. ("Finn") and U.S. Patent Application No. 4,504,888 issued to Rosenthal ("Rosenthal"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP §2142

[t]o establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. (*In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)).

Further, according to MPEP §2143.03, "[t]o establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (*In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." *"All words in a claim must be considered* in judging the patentability of that claim against the prior art." (*In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970), emphasis added.)

Applicant's amended claim 1 contains the limitations of

a first and a second light fixture coupling bracket each adapted to removably couple to a frame of a light box, the first and the second light fixture coupling brackets each including a first and a second through-hole and coupled to the frame by a light bar coupling device inserted into the first through-hole of the first and the second light fixture coupling brackets, a first and a second tightening handle each coupled to a light fixture coupling bracket through the second through-hole of the first and the second light fixture coupling brackets wherein said light bar coupling device

including an attaching pin to couple to a light bar having at least one socket adapted to accept the attaching pin within the at least one socket, said plurality of light fixture coupling brackets adaptable to couple to a removably and adjustable gripping device including a gripping pin, said gripping device is rotatably adjusted around said light box, said gripping device coupled with the first and the second tightening handles and the first and the second light fixture coupling brackets.

Applicant's amended claim 5 contains the limitations of

a light bar having at least one socket adapted to attach to an attaching pin, the attaching pin to couple to the at least one socket through insertion into the at least one socket, said light bar including at least one removable gripping device, said gripping device including a gripping pin substantially centered on a rear portion of said light bar, said gripping pin removable from said gripping device, said gripping device removably coupled to a plurality of light fixture coupling brackets through a first and a second tightening handle, wherein said removable gripping device removably coupled to a light box having a plurality of expansion rods coupled to a first and a second frame, and each of a plurality of light fixture coupling devices removably coupled through the light bar and through the plurality of light fixture coupling brackets.

Finn discloses a lighting box. It is asserted in the Office Action that Finn illustrates a light bar 14. The light bar in Finn, however, does not teach, disclose or suggest "a light bar coupling device including an attaching pin to couple to a light bar having at least one socket adapted to accept the attaching pin within the at least one socket." That is, the light bar in Finn is a mounting bar where lights are mounted to the bar. The light bar in Finn uses c-clamps 90 to mount lights to the light bar 14. Applicant's light socket is more similar to a socket wrench type of coupling where Applicant's attaching pin is inserted into the socket. Applicant notes that there are different meanings for the term socket. The meaning used in the Office Action relates to a light socket where a light bulb is inserted or screwed in to a socket that is electrically connected to a power source. This is different than the meaning asserted in Applicant's specification and depicted in the Figures. Applicant's claim amendments further clarify the difference between a light bulb type of socket and Applicant's attaching socket.

Additionally, Applicant notes that the light bar disclosed in Finn is just a bar where C-clamps are used for attaching lighting. Finn does not illustrate nor describe light fixture coupling brackets adapted to removably couple to a frame, especially where a light bar coupling device, or tightening handles are coupled to the light fixture coupling brackets.

Further, Finn does not teach, disclose or suggest

the first and the second light fixture coupling brackets each including a first and a second through-hole and coupled to the frame by a light bar coupling device inserted into the first through-hole of the first and the second light fixture coupling brackets, a first and a second tightening handle each coupled to a light fixture coupling bracket through the second through-hole of the first and the second light fixture coupling brackets.

nor “each of a plurality of light fixture coupling devices removably coupled through the light bar and through the plurality of light fixture coupling brackets.”

Rosenthal discloses a light having support means pivotally connected to the body to aim the light. Also disclosed are a light source 13, cooling device 17, collar 20, flanges 26 and mounting plate 12. Rosenthal does not teach, disclose or suggest a light bar with at least one light socket. Further, Rosenthal does not teach, disclose or suggest “a light bar coupling device including an attaching pin to couple to a light bar having at least one socket adapted to accept the attaching pin within the at least one socket.” Further, Rosenthal does not teach, disclose or suggest “each of a plurality of light fixture coupling devices removably coupled through the light bar and through the plurality of light fixture coupling brackets.” Moreover, it is asserted in the Office Action that Rosenthal discloses reference 16 in Fig. 2 as a gripping pin. Reference 16, however, is a bolt to be attached to a ceiling or other mounting surface. A bolt is certainly distinguishable from a gripping pin.

Finn is concerned with a collapsible lighting box with multiple light sources and light diffusing. Finn is made of a frame with soft material surrounding the frame. If the

"adjustable gripping" device of Rosenthal were to be combined with the invention of Finn, Finn would lose the ability to adjust lighting direction as Finn discloses four adjustment eye bolts 81. Bracket 11 of Rosenthal would limit Finn to: 1) limit of hanging distance by the length of bracket 11; 2) limited angle adjustments as bracket 11 only allows adjustment in one axis; 3) loss of simplicity as a bolt must be driven into a place in the green bed as opposed to chain or rope (see Finn, column 4, lines 53-59); 4) loss of a simple means to suspend the light box or boxes and ease of moving as Rosenthal's bracket must be bolted in. Therefore, adding bracket 11 to Finn would defeat Finn's goals.

Neither Finn, Rosenthal, nor the combination of the two teach, disclose or suggest all the limitations contained in Applicant's amended claims 1 and 5 as listed above. Since neither Finn, Rosenthal, nor the combination of the two teach, disclose or suggest all the limitations of Applicant's amended claims 1 and 5, Applicant's amended claims 1 and 5 are not obvious over Finn in view of Rosenthal since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claims that directly or indirectly depend from amended claims 1 and 5, namely claims 3-4, and 6, respectively, would also not be obvious over Finn in view of Rosenthal for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejections for claims 1 and 3-6 are respectfully requested.

CONCLUSION

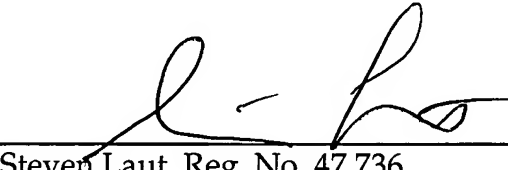
In view of the foregoing, it is submitted that claims 1, 3-6 patentably define the subject invention over the cited references of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR, & ZAFMAN LLP

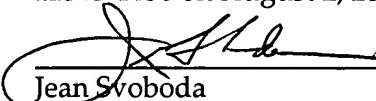
Dated: August 2, 2005

By: 
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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail with sufficient postage in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on August 2, 2005.


Jean Svoboda